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6 Attorneys for Defendants Alphabet Inc. and
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8 UNITED STATES DISTRICT COURT

9 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION
10

11 PAUL GARRISON,

12 Plaintiff,

13 vs.

14 ALPHABET INC., GOOGLE LLC, OUTTEN
& GOLDEN LLP, WAYNE N. OUTTEN,
15 ANNE GOLDEN, JUSTIN SWARTZ,
MELISSA WASHINGTON, BRIAN LEE
16 JOHNSRUD, CURLEY, HURTGEM &
JOHNSRUD LLP, CIERRA GROSS and
DOES 1-50, inclusive,
17

18 Defendants.
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Case No. 3:22-cv-01426-JSC

**STIPULATION FOR FURTHER
EXTENSION OF TIME FOR
DEFENDANTS TO ANSWER OR
RESPOND TO AMENDED COMPLAINT
UNDER L.R. 6-1(a)**

The Hon. Jacqueline Scott Corley

Amended Complaint Filed: March 14, 2022

24 Plaintiff Paul Garrison (“Plaintiff”) and Defendants Alphabet Inc., Google LLC, Outten &
25 Golden LLP, Brian Lee Johnsrud, Curley, Hurtgen & Johnsrud LLP, and Cierra Gross
26 (“Defendants”)¹, collectively, “the Parties,” by and through their undersigned counsel, jointly
27

28 ¹ Wayne N. Outten, Anne Golden, Melissa Washington, and Justin Swartz shall also be considered
“Defendants” for purposes of this stipulation.

1 submit this stipulation as follows:

2 WHEREAS, on March 14, 2022, Plaintiff filed the operative Amended Complaint in the
3 above-captioned matter;

4 WHEREAS on April 4, 2022, the Parties filed a Stipulation for Extention of Time for
5 Defendants to Answer or Respond to Amended Complaint Under L.R. 6-1(a) ("April 4, 2022
6 Stipulation") (ECF No. 9), indicating that the Parties had agreed to participate in mediation and
7 extending the respective times for Defendants to answer or respond to the Amended Complaint
8 pending the completion of the mediation;

9 WHEREAS, on May 4, 2022, the Parties attended mediation;

10 WHEREAS, on May 9, 2022, the Parties reached an agreement in principle to settle this
11 litigation;

12 WHEREAS, the Parties agree to extend by an additional 30 days the deadlines set forth in
13 the April 4, 2022 Stipulation to allow the Parties time to finalize a formal settlement agreement;

14 WHEREAS, the Parties agree that by further deferring the time for responding to the
15 Amended Complaint, Defendants do not waive or otherwise relinquish any arguments or defenses
16 that might be asserted in their responses to the Amended Complaint, whether by answer or motion,
17 and that all such arguments and defenses are preserved;

18 WHEREAS, the Parties agree that there is good cause supporting the requested extension.

19 IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff and Defendants,
20 through their respective counsel, and pursuant to Local Rule 6-1(a) of the United States District
21 Court for the Northern District of California, that (i) the respective times for Defendants to answer
22 or respond to the Amended Complaint will be extended an additional 30 days beyond the
23 deadlines set forth in the April 4, 2022 stipulation; and (ii) Defendants do not waive or otherwise
24 relinquish any arguments or defenses that might be asserted in their responses to the Amended
25 Complaint, whether by answer or motion, and all such arguments and defenses are hereby
26 preserved.

1 Dated: May 20, 2022

FARELLA BRAUN + MARTEL LLP

2
3 By: /s/ Anthony P. Schoenberg
Anthony P. Schoenberg

4 Attorneys for Defendants Alphabet Inc. and
5 Google LLC

6
7 Dated: May 20, 2022

8
9 By: /s/ Laurence S. Moy
Laurence S. Moy

10 Attorney for Defendants Outten & Golden LLP

11 Dated: May 20, 2022

CURLEY, HURTGEN & JOHNSRUD LLP

13
14 By: /s/ Katherine C. Huibonhoa
Katherine C. Huibonhoa

15 Attorneys for Defendants Brian Lee Johnsrud and
16 Curley, Hurtgen & Johnsrud LLP

17 Dated: May 20, 2022

Springer Ayeni, PLC

19
20 By: /s/ Cassie Ayeni
Cassie Ayeni

21 Attorneys for Defendant Cierra Gross

22 Dated: May 20, 2022

Law Offices of Bonner & Bonner

24
25 By: /S/ Charles A. Bonner
Charles A. Bonner

26 Attorneys for Plaintiff Paul Garrison

ATTESTATION

I hereby attest that I have obtained the concurrence of all other signatories in the filing of this document.

Dated: May 20, 2022

FARELLA BRAUN + MARTEL LLP

By: /s/ Anthony P. Schoenberg
Anthony P. Schoenberg

Attorneys for Defendants Alphabet Inc. and
Google LLC